Chapter 13

Record Keeping

Record Keeping Requirements by Type of Activity

Record keeping requirements depend on the types of activities performed at your business. Answer the questions below and then refer to the appropriate table(s) to help determine what records you are required to keep.

I. Do you store <u>hazardous substances</u> in reportable quantities?

II. Do you generate <u>hazardous wastes</u> in any amount?

III. Do you accumulate, store, or treat hazardous wastes in stationary tanks or transfer, pump, or drain hazardous wastes through a tank system?

IV. Do you treat hazardous wastes on site?

<u>Table 1 - HAZARDOUS SUBSTANCE STORAGE</u>

	Document Title and Requirements				
1	Unified Program Facility Permit Keep the current permit available on site.				
2	Hazardous Materials Business Plan http://www.sdcounty.ca.gov/deh/hmd/pdf/HMBP-2007/hm-952_03-07.pdf Keep the following documents on site and submit changes to the CUPA within 30 days. Inventory of Hazardous Materials Emergency Response Plan Employee Training Description Site Map Business Owner Operator Identification form Business Activities form http://www.sdcounty.ca.gov/deh/hmd/docs/hm-9701-upcf_7-02.doc	В			
3	Hazardous Materials Business Plan Certification Statement http://www.sdcounty.ca.gov/deh/hmd/pdf/hm-953%20_05-06.pdf Submit annually to the CUPA and keep a copy on site.				
4	Release Reporting Documentation http://www.oes.ca.gov/Operational/OESHome.nsf/Content/2642671598689A018 http://www.oes.ca.gov/Operational/OESHome.nsf/Content/2642671598689A018 https://www.oes.ca.gov/Operational/OESHome.nsf/Content/2642671598689A018 https://www.oes.ca.gov/Operational/OESHome.nsf/Content/2642671598689A018 https://www.oes.ca.gov/openDocument It is prudent to keep proof of reports made to agencies.	E			
5	Annual Carcinogen & Reproductive Toxins Reporting List Use this form to annually report carcinogens or reproductive toxins that you handle below 55 gallons, 500 pounds, or 200 cubic feet of a compressed gas ("Disclosure of Hazardous Materials Information Bulletin" http://www.sdcounty.ca.gov/deh/hmd/docs/hm-9243_03-03.doc and List of Carcinogen & Reproductive Toxins) http://www.oehha.ca.gov/prop65/prop65 list/files/P65single092807.pdf	F G			

Table 2 – HAZARDOUS WASTE GENERATORS

Document Title and Requirements					
1	Unified Program Facility Permit Keep the current permit available on site.				
2	Hazardous Waste Manifests Copies of Consolidated Manifests for disposal of used oil, parts cleaning solvents, hydroxide sludge from wastewater treatment, paint related wastes, etc. Shipping Receipts and Bills of Lading for disposal of batteries, universal waste, scrap metal, excluded recyclable materials, etc. Keep on site for at least 3 years.	J			
3	Exception Reports for manifests that are not returned signed from the disposal facility within 45 days. Keep onsite for at least 3 years.				
4	Land Disposal Notifications and/or Land Disposal Restriction documents for each hazardous waste stream sent off-site, or treated and disposed of to the POTW. Keep on site for 3 years from last on-site treatment or off-site disposal.				
5	Waste classifications, determinations, and waste analysis data Keep for at least 3 years since the waste was last treated on-site or sent offsite.				
6	Proof of EPA Identification Number from California or U.S. EPA. (DTSC Fact Sheet: EPA Identification Numbers and form for California Numbers)				
7	Hazardous Materials Business Plan http://www.sdcounty.ca.gov/deh/hmd/pdf/HMBP-2007/hm-952_03-07.pdf If ≥ 55 gallons or 500 pounds of hazardous waste or ≥1 kg of acutely or extremely hazardous waste are accumulated, keep the following records on site and submit changes to CUPA within 30 days: I Hazardous Waste Inventory Emergency Response Plan/Contingency Plan List of Emergency Contact Individuals with 24 hour phone numbers List of Emergency Equipment Employee Training Description Site Map	В			

 $\underline{Table\ 2-HAZARDOUS\ WASTE\ GENERATORS}\ (\text{continued})$

	Document Title and Requirements	Exhibit Letter
8	Employee Training Records Initial employee training and annual refresher training must include: methods for safe handling of hazardous wastes, procedures for treatment of waste if applicable, use of emergency equipment, employee job titles and descriptions. LQGs only - must keep records on site for 3 years	N
9	Contingency Plan Must include: actions that will be taken in response to fire, explosion, sudden or non-sudden release of hazardous waste/constituents to air, soil, or surface water; list of names, addresses, & phone numbers of facility emergency coordinators; list of all emergency equipment; evacuation plan; and current phone number for the Office of Emergency Services. LQGs – this may be part of the Hazardous Materials Business Plan SQGs - posting by telephones meets this requirement.	O
10	Hazardous Waste (Biennial) Report 2005 DTSC supplemental instructions are found at the bottom of the following: http://www.dtsc.ca.gov/HazardousWaste/AnnualReports/index.cfm U.S. EPA forms and instructions: Required if more than 270 gallons or 2200 pounds of RCRA hazardous waste or 2.2 pounds of RCRA acutely hazardous waste were generated in any one month. Due each even numbered year by March 1, covering the previous odd numbered year. Keep for at least 3 years from the due date of the report. http://www.dtsc.ca.gov/HazardousWaste/AnnualReports/upload/HWMP_Rpt_BHW-2.pdf The 2005 form and instructions for the EPA expire October 31, 2007. Biennial Report forms for 2007 were not available when this manual was printed. Check the DTSC website for the most up-to-date forms. http://www.dtsc.ca.gov/PublicationsForms/prog_pubs.cfm?prog=Managing%2_0Waste	P
11	Release Reporting Documentation http://www.oes.ca.gov/Operational/OESHome.nsf/Content/2642671598689A0188256C2C00763702?OpenDocument It is prudent to keep proof of reports made to agencies.	E

 $\underline{Table\ 2-HAZARDOUS\ WASTE\ GENERATORS}\ (\text{continued})$

	Document Title and Requirements	Exhibit Letter
12	Excluded Recyclable Materials Keep recycling documentation including: • flow rates of recyclable wastes • detailed flow diagram of the recycling process in question • tank and equipment capacities • total wastewater reuse quantities • relevant discharge information of treated waste sent to public sewer system • "treated water" usage descriptions (what process, how often, etc.) When more than 27 gallons or 220 pounds of these materials are recycled on site, submit CUPA Recyclables Materials Reports by July 1 of even numbered years. Report required information for the 2 previous calendar years. http://www.sdcounty.ca.gov/deh/hmd/docs/hm-9713-upcf_7-02.doc	Q
13	Source Reduction Evaluation Review and Plan, Hazardous Waste Management Performance Report, and Summary Progress Report http://www.dtsc.ca.gov/PollutionPrevention/SB14/upload/sb14-guidance-manual.pdf DTSC Guidance and Electronic Summary Progress Report: http://www.dtsc.ca.gov/PollutionPrevention/SB14/upload/SPR Excel Form20 06_2.xls Applies only to generators of ≥26,400 lbs of hazardous waste or ≥26.4 lbs of extremely hazardous waste in a qualifying calendar year (2002, 2006, 2010). Due every four years by September 1st (2003, 2007, 2011). You can make this report online, if you prefer, by visiting: http://www.dtsc.ca.gov/database/SB14/index.cfm All 3 documents are to be kept on site (CCR 67100.3).	R
14	Universal Waste Aerosol Cans Processing Notification Submit one-time notification form to the CUPA.	S
15	Large Quantity Universal Waste Handlers Only if ≥11,000 lbs of universal wastes are handled per year. Must maintain tracking receipts/shipping papers. Small Quantity Universal Waste Handlers If <11,000 lbs of universal wastes are handled per year. Must be able to demonstrate the length of time the UW has been accumulated on site, pursuant to Title 22 CCR Section 66273.39.	

$\underline{Table\ 2-HAZARDOUS\ WASTE\ GENERATORS}\ (\text{continued})$

	Document Title and Requirements	Exhibit Letter
16	Weekly Hazardous Waste Container Inspections Hazardous waste accumulation containers must be inspected at least weekly. Documentation or logs of inspections are not required, but are a good way to insure that the basic accumulation and labeling requirements (Title 22 CCR Section 66262.34) are being met.	Т

Table 3 - HAZARDOUS WASTE TANK SYSTEMS

	Document Title and Requirements Records to keep available onsite	Exhibit Letter		
1	Daily Tank System Inspection Records Required for LQGs only. See sample format.			
2	 Professional Engineer's Hazardous Waste Tank System Assessment Required for LQGs, PBR, and CA only. Required annually if tank system does not have proper secondary containment. Required every five years with proper secondary containment for new non-RCRA tank systems. Must include integrity reports or new system assessments, & certification statement. 			
3	Tank System Closure Records CUPA reporting form of closure and decontamination http://www.sdcounty.ca.gov/deh/hmd/docs/hm-9704-upcf 7-02.doc	U, V		
4	Report of releases from tank systems that enter the environment Release Reporting is specified in Title 22 CCR Section 66265.196(e) It is prudent to keep proof of reports made to agencies.			
5	Records of VOCs from waste tanks VOC record keeping is specified in Title 22 CCR Section 66265.1090			

Record Keeping

<u>Table 4 – HAZARDOUS WASTE TREATMENT RECORDS</u>

Conditional Exemption		Conditional Authorization	Permit by Rule	
1 Notification of Onsite Hazardous Waste treatment to SD CUPA 60 days before treatment. Must include any amendments and plot map of treatment units.	1	Notification of Onsite Hazardous Waste Treatment to SD CUPA 60 days before treatment. Must include any amendments and plot map of treatment units.		Annual notification of Onsite Hazardous Waste treatment to SD CUPA 60 days before treatment. Must include any amendments and plot map of treatment units.
2 Proof of sewer discharge authorization or waste pretreatment permits from local sewer agency	2	Proof of sewer discharge authorization or waste pretreatment permits from local sewer agency		Proof of sewer discharge authorization or waste pretreatment permits from local sewer agency.
3 Written operating instructions for treatment unit and records of dates, amounts, and types of waste treated.	3	Written operating instructions for treatment unit and records of dates, amounts, and types of waste treated.	-	Written operating instructions for treatment unit and records of dates, amounts, and types of waste treated.
4 Written Inspection Schedule and logs of inspections conducted.	4	Written Inspection Schedule and logs of Inspections conducted.	4	Written Inspection Schedule and logs of inspections conducted.
Written notification to CUPA upon completion of all activities required to permanently cease operation of treatment process or unit.	5			Written notification to CUPA upon completion of all activities required to permanently cease operation of treatment process or unit.
	6	Proof of annual waste minimization certification to CUPA.	•	Proof of annual waste minimization certification to CUPA.
	7	Copy of completed Phase One Environmental Assessment (and amendments if required).		7 Copy of completed Phase One Environmental Assessment (and amendments if required).
	8			R Closure Cost Estimates with annual adjustments by March 1st and Financial Assurance Certification notification to CUPA using unified form
	9	Keep proof of testing for ancillary equipment for tank or container every two years	9	Written Closure Plan for the treatment unit, and amendments when necessary. Proof of notification to CUPA of initiation of closure activities for the treatment unit.
			10	Proof of certification of closure by independent, Professional Engineer for PBR unit closure pursuant to the facility's closure plan document.
			1	1 Waste Analysis Plan

<u>Table 5 – TIERED PERMITTING FORMS</u>

		Document Title and Requirements	Exhibit Letter			
	Phase 1 Environmental Assessment (PBR and CA facilities only) http://www.dtsc.ca.gov/HazardousWaste/upload/HWM-TP_Phase-I-Env-					
1	Assessment-Chcklist Instructions.pdf					
1	http://www.dt Assessment-C	sc.ca.gov/HazardousWaste/upload/HWM-TP_Phase-I-Env- hcklist.pdf				
	Complete Che	ecklist and mail to DTSC. Keep copies onsite				
2	Tiered Permitting Flowchart (for tier determination reference only) http://www.sdcounty.ca.gov/deh/hmd/html/pdf/onsite-tiered-permitting-flowchart.pdf					
	Tiered Permi	tting Forms for Notification of Onsite Hazardous Waste Treatment				
	Facility page:	http://www.sdcounty.ca.gov/deh/hmd/docs/hm-9705-upcf_7-02.doc				
	Unit Page:	http://www.sdcounty.ca.gov/deh/hmd/docs/hm-9706-upcf_7-02.doc				
	Certificate of 1	Financial Assurance: http://www.sdcounty.ca.gov/deh/hmd/docs/hm-9707-upcf_07-02.doc				
	Treatment Pro	cess Pages (use only one of the following per unit):				
3	PBR	http://www.sdcounty.ca.gov/deh/hmd/docs/hm-9712-upcf_7-02.doc	Z			
	CA	http://www.sdcounty.ca.gov/deh/hmd/docs/hm-9708-upcf_7-02.doc				
	CEL	http://www.sdcounty.ca.gov/deh/hmd/docs/hm-9709-upcf_7-02.doc				
	CESQT	http://www.sdcounty.ca.gov/deh/hmd/docs/hm-9710-upcf_7-02.doc				
	CESW	http://www.sdcounty.ca.gov/deh/hmd/docs/hm-9711-upcf_7-02.doc				
	Submit to the CUPA annually via certified mail for facilities with PBR treatment.					
		nd when there are any changes for CE and CA treatment.				
	Keep copies on site for reference.					